

# EXHIBIT 11

**NETWORK DEPOSITION SERVICES**  
**Transcript of Kimberly Frey 30 (b) (6)**

1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF PENNSYLVANIA

3 - - -  
4 DONALD J. TRUMP FOR )  
PRESIDENT, INC., et al., )  
5 )  
Plaintiffs, )  
6 )  
vs. ) No.  
7 ) 2:20-cv-966-RN  
KATHY BOOCKVAR, et al., )  
8 )  
Defendants. )  
9

10 - - -  
11 Videotape Video Conference 30(b)(6) Deposition of  
12 ELK COUNTY BOARD OF ELECTIONS  
KIMBERLY FREY, Designated Deponent

13 Monday, September 28, 2020

14 - - -  
15 The videotape video conference deposition of  
16 KIMBERLY FREY, called as a witness by the plaintiffs,  
17 pursuant to notice and the Federal Rules of Civil  
18 Procedure pertaining to the taking of depositions,  
19 taken before me, the undersigned, Lance E. Hannaford,  
Notary Public in and for the Commonwealth of  
Pennsylvania, at 2568 Aldon Drive, Sewickley,  
Pennsylvania 15143, commencing at 1:11 o'clock p.m.,  
the day and date above set forth.

20 - - -  
21 NETWORK DEPOSITION SERVICES  
22 SUITE 1101, GULF TOWER  
23 PITTSBURGH, PENNSYLVANIA  
24 866-565-1929  
25

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18

1 A Yes.

2 Q Are you having any additional drop boxes  
3 than that one around the corner from your elections  
4 office?

5 A No.

6 Q So you will only have that one drop box for  
7 the general election?

8 A That's correct.

9 Q Where will it be located?

10 A It will be located right outside our office  
11 door.

12 Q I believe, for the primary election, it was  
13 sort of around the corner in a hallway from the  
14 election office.

15 Is that correct?

16 A It was right outside of our office door.

17 Q Is it within sight of the election workers  
18 working in the office?

19 A No. It has a security camera on it.

20 Q Okay.

21 So my question, though, somebody standing  
22 at the counter in your election office, they can't see  
23 the drop box?

24 A No. That's correct.

25 Q And that is going to be the same situation

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24

1     that drop box?

2           A       I don't have an answer to that.

3                   MR. WAGNER: Could you please repeat the  
4     question, please?

5           Q       Let me ask it a different way.

6                   Is your county implementing any measures to  
7     prevent third party delivery of ballots of  
8     non-disabled voters to that drop box?

9                   MR. WAGNER: In other words, can it only be  
10    the voter who drops the ballot off?

11          A       I don't know.

12          Q       What would your county election workers do  
13    if it is determined a ballot was improperly delivered  
14    by a third party?

15          A       I don't know how we would know that.

16          Q       So would you agree with me there is no way  
17    to prevent that with this drop box?

18          A       That's correct.

19          Q       How often is the drop box -- how often will  
20    the drop box be emptied and those ballots collected  
21    for the general election?

22          A       In the primary, we empty it at noon, at  
23    5:00 o'clock, and then at 8:00 o'clock.

24          Q       That is on Election Day?

25          A       Yes. That is on Election Day. Because in